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**RONALD RUBINSTEIN**  
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**Of Counsel:**  
**MARSHALL A. MINTZ**

**ANGELA D. LIPSMAN (NY; NJ)**

May 19, 2025

The Honorable Lorna G. Schofield  
United States District Judge  
Southern District of New York  
40 Foley Square  
New York, New York 10007

Re: United States v. Joel Merced-Perez  
22 Cr. 576 (LGS)

Dear Judge Schofield:

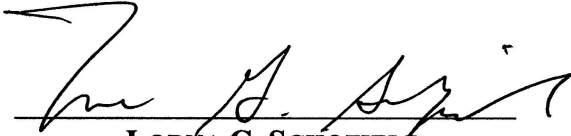
I represent Defendant Joel Merced-Perez in this action. It is my understanding that the Court directed the Probation Department to conduct the interview of the defendant for the Presentence Report by May 22, 2025.

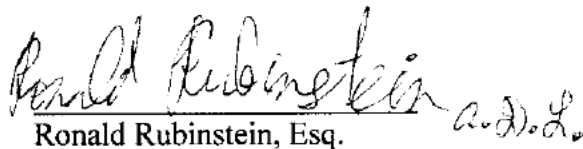
However, to date, defense counsel has not been available for the interview. I have been out of the office on medical leave since April 29, 2025. I [REDACTED]

Wherefore, I am requesting that the time for Probation to conduct the interview be extended by 14 days, and that the deadlines for the disclosures of the Presentence Report, and for the parties' sentencing submissions, be adjusted accordingly.

Thank you for your consideration.

Respectfully submitted,

  
**LORNA G. SCHOFIELD**  
**UNITED STATES DISTRICT JUDGE**

  
**Ronald Rubinstein, Esq.**

cc: A.U.S.A. Camille Fletcher (via email)  
Probation Officer Ali Eftekhary (via email)

Application Granted. The sentencing hearing currently scheduled for August 25, 2025, is adjourned to **September 16, 2025, at 11:00 a.m.** Defendant's sentencing submission shall be filed by **August 25, 2025**. The Government's sentencing submission shall be filed by **August 28, 2025**. The Clerk of the Court is directed to terminate the letter motion at docket number 30.

Dated: May 30, 2025